

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
IRON MOUNTAIN INTELLECTUAL)	
PROPERTY MANAGEMENT, INC.)	
)	
Interpleader-Plaintiff,)	
)	
v.)	Civil Action
)	No. 05-10018-RGS
FIDELITY INFORMATION)	
SERVICES, INC., f/k/a)	
ALLTEL INFORMATION SERVICES,)	Request for ex parte
INC., and TOYOTA MOTOR CREDIT)	consideration
CORPORATION,)	
)	
Interpleader-Defendants.)	
_____)	

**DECLARATION OF DORIENE VIERA IN SUPPORT OF
TOYOTA FINANCIAL SERVICES' APPLICATION FOR TEMPORARY
RESTRAINING ORDER**

I, Doriene Viera, declare as follows:

1. I am a Corporate Manager for Toyota Financial Services ("TFS") the moving party for this application. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.
2. I have been actively involved with the OSCAR project since August 2003.
3. Fidelity personnel informed me that Fidelity had split the OSCAR project off from Fidelity's main code line, essentially creating a separate code line for OSCAR. Based on these statements, I understand that Fidelity was developing two version of its code, one version exclusively for Toyota and one version for its other customers.

4. In approximately May 2004, I attended a meeting that included Randy Gillis, and John Fitzpatrick (John Vaughn's immediate supervisor) in TFS's offices in Torrance, California. At that meeting, Mr. Fitzpatrick told us that Fidelity had determined that the OSCAR application would have to be rearchitected to meet Toyota's requirements.

5. In early 2004 I was present at a meeting with John Vaughan and Christine Galluchi in which we addressed the potential for hiring Microsoft to evaluate the OSCAR system. Ms. Galluchi and I expressly asked Mr. Vaughan to hire Microsoft to perform this analysis. Mr. Vaughan refused. Subsequently, TFS hired Microsoft at its own expense to evaluate the OSCAR system.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration is executed on this 16 day of January 2005 at Los Angeles California.


DORIENE VIERA